

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division

FILED

2016 FEB 24 A 10:56

CLERK US DISTRICT COURT
ALEXANDRIA VIRGINIA

Violation #4109936

16 PO 728

UNITED STATES OF AMERICA,)

v.)

MICHAEL GORDON)

Defendant.)

CONSENT MOTION TO CONTINUE

COMES NOW, the Defendant, Michael Gordon, by and through his counsel, Sean E. Underwood, and moves to continue the upcoming court date for this case that is currently scheduled on March, 24, 2016 and states as follows:

1. March 24, 2016 is the first scheduled court date in this matter. This case is not yet set up in the court's electronic filing system. Defendant is charged with speeding in excess of the posted speed limit.
2. The undersigned counsel has been retained and filed an appearance in this matter. However, counsel has a scheduling conflict on March 24 as a result of pre-scheduled travel outside of the United States.
3. The United States, by and through is counsel, Daniel McGraw, Esq., does not object to the requested continuance. Upon information and belief, counsel is advised that Park Police Officer Amaya, the government's primary witness, has alternate court dates on April 14, 2016 and April 28, 2016. Defendant, by and through his counsel, would request a continuance to one of these alternative dates.
4. A continuance of this case will not cause undue prejudice to any person or party.

WHEREFORE, for the reasons stated herein, the defendant, with consent of the United States, respectfully moves this Honorable Court for a continuance of this matter from March 24, 2016 to April 14, 2016 or April 28, 2016.

MICHAEL GORDON
By Counsel,



Sean E. Underwood, VSB # 36117
Counsel for Defendant
2121 Eisenhower Avenue, Suite 200
Alexandria, VA 22314
Tel. (703) 339-3500
Fax. (703) 684-3620
Sean.underwood@cox.net

Certificate of Service

I HEREBY CERTIFY THAT A TRUE COPY of the foregoing was mailed and to Daniel McGraw, Esq., at the Office of the United States Attorney, 2100 Jamison Avenue, Alexandria, VA 22314 on this 24th day of February, 2016.



Sean E. Underwood